

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHERNO NJIE,

Defendant.

) INDICTMENT CR 15-35 DSD/HB
)
) (18 U.S.C. § 371)
) (18 U.S.C. § 960)
) (18 U.S.C. § 924 (o))
)
)
)
)

THE UNITED STATES GRAND JURY:

INTRODUCTORY ALLEGATIONS

At all times material to this Indictment:

1. Defendant **CHERNO NJIE** was a resident of Lakeway, Texas.
2. P.F., who is named as a coconspirator but not as a defendant herein, was a resident of Brooklyn Park, Minnesota.
3. A.B., who is named as a coconspirator but not as a defendant herein, was a resident of La Vergne, Tennessee.

COUNT 1

(Conspiracy to Make an Expedition Against a Friendly Nation)

4. From a date unknown, and continuing until on or about January 1, 2015, within the State and District of Minnesota, and elsewhere, the defendant,

CHERNO NJIE,

did knowingly and willfully conspire and agree with others, known and unknown to the

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Grand Jury, to participate in an attempt to overthrow the government of The Gambia, a nation with whom the United States is at peace, an offense which violates 18 U.S.C. § 960 (the Neutrality Act); all in violation of Title 18, United States Code, Section 371.

5. As part of the conspiracy, defendant **NJIE** participated in regular conference calls with the other members of the conspiracy, including with P.F. who participated in these calls from his home in Minnesota. In these calls defendant **NJIE** discussed operational and logistical planning for the attempted overthrow of the Gambian government with the other members of the conspiracy.

6. As a further part of the conspiracy, defendant **NJIE** provided financial support to the conspiracy. For example, on or about April 15, 2014, defendant **NJIE** provided to A.B. approximately \$1,881.00 to support the overthrow of the Gambian government.

7. As a further part of the conspiracy, P.F. purchased eight (8) M4 semiautomatic rifles in Minnesota, broke them down into their component parts, hid the parts in barrels, and shipped the barrels containing the rifle components from the United States to The Gambia.

8. As a further part of the conspiracy, P.F. departed his home in Minnesota and traveled to The Gambia in order to participate in the effort to overthrow the Gambian government.

9. As a further part of the conspiracy, A.B. departed the United States for The Gambia.

10. As a further part of the conspiracy, on or about December 19, 2014, defendant **NJIE** departed the United States for The Gambia with the intention of serving as the interim leader of The Gambia following the execution of the planned overthrow of the Gambian government, all in violation of Title 18, United States Code, Section 371.

COUNT 2

(Conspiracy to Use a Firearm During and in Relation to Crime of Violence)

11. From a date unknown, and continuing through in or about January 1, 2015, within the District of Minnesota and elsewhere, the defendant,

CHERNO NJIE,

knowingly and intentionally conspired and agreed with others, known and unknown to the Grand Jury, to carry and use a firearm, to wit: an M4 semiautomatic rifle, during and in relation to a crime of violence which may be prosecuted in a court of the United States; namely, both (1) a substantive violation of Title 18, United States Code, Section 960; and (2) conspiracy to violate Title 18, United States Code, Section 960, as alleged in Count One, all in violation of Title 18, United States Code, Section 924(o).

A TRUE BILL

UNITED STATES ATTORNEY

FOREPERSON